

FOSTER WORLEY,
Plaintiff,

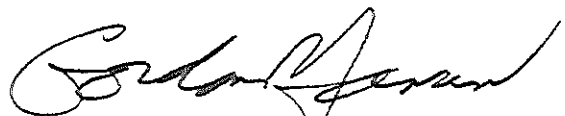
-vs-

JAMES GRIMES,
Defendant.

)) IN THE CIRCUIT COURT OF
((
((BALDWIN COUNTY, ALABAMA.
((
((AT LAW.
((
((
((CASE NO. 2721

COUNT ONE

Plaintiff claims of the Defendant the sum of Five Hundred (\$500.00) Dollars as damages, in this, that heretofore on to-wit: the 13th day of October, 1954, the Defendant so negligently operated a motor vehicle in a northwesterly direction on U. S. Highway 90 in Loxley, Baldwin County, Alabama, a public highway in Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was then being driven in a southerly direction on said U. S. Highway 90, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.



ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA *

COUNTY OF BALDWIN *

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Grimes to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of Foster Worley.

Witness: Alice J. Duck, Clerk of said Court, this 6th day of Sept, 1955.

Attest: Alice J. Duck
CLERK

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SHERIFF'S RETURN

Received _____ day of _____, 1955, and on the 10 day of Sept, 1955, I served a copy of the within complaint on James Grimes by service on James Grimes.

Taylor Wilkins
SHERIFF
Clough Stead

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

September 2, 1955

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith find original and one copy of
summons and complaint which we wish to file in your court.

Please acknowledge receipt of these papers and
let us know when service has been accomplished on the de-
fendant.

Very truly yours,

GORDON & JANSEN

BY: 

VRJjr/pjb

Encls.